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June 17, 2025

APPLICATION GRANTED

 6/18/2025
Hon. Katharine H. Parker, U.S.M.J.

VIA ECF

Honorable Magistrate Judge Katharine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 17D
New York, NY 10007-1312

Re: *Ortega, et al. v. Zoni Language Centers, Inc., et al.*
Case No. 1:24-cv-08223(DEH/KHP)

Dear Magistrate Judge Parker,

I write jointly with Plaintiffs' counsel to respectfully request a second short adjournment of the deadline to submit the parties' letter regarding ESI terms and the Plaintiffs' proposed amended complaint or objections to the proposed amended complaint with briefing schedule. Defendants are in receipt of, and considering, the proposed amended complaint as well as a draft of the aforesaid letter. Since Defendants' receipt, Ria Julien and I have been engaged in discussions in an effort to avoid motion practice and to allow for the parties to resolve any disputes that currently exist. To facilitate these efforts, the parties request a brief adjournment.

We are seeking to submit the Plaintiffs' proposed amended complaint or objections and a briefing schedule by Monday, June 23, 2025 and also to submit the letter addressing ESI terms by June 23, 2025. This is the parties' second request for an adjournment. There will be no prejudice to either party given the shortness of the adjournment.

We apologize for the lateness of the request and appreciate Your Honor's consideration in this matter.

Respectfully submitted,

CLARK HILL

s/ Regina E. Faul
Regina E. Faul